



# Cargo Pilot Flight and Duty Time Rules: **MYTHS & FACTS**



## **MYTH:**

There is currently a different level of safety for cargo and passenger airlines. The flight and duty time regulations for cargo pilots are weaker than the regulations for passenger pilots.



## **FACT:**

There is an equivalent level of safety – including stringent flight duty time regulations – in place for both cargo and passenger airlines. These regulations are tailored to the different operational characteristics and scheduling requirements of cargo and passenger carriers specifically to optimize safety.

- The FAA conducted an exhaustive review during the Obama Administration and determined conclusively that Part 121 regulations ensure safer operations for cargo airlines. The FAA's analysis concluded that applying Part 117 regulations to cargo carriers would not result in any discernable enhancement to safety.
- Cargo carriers are required to have FAA-approved Fatigue Risk Management Plans that include fatigue mitigation measures, fatigue and incident reporting processes, and systems for monitoring pilot fatigue.



## **MYTH:**

If the accident rate of all-cargo operations was applied to passenger operations, there would be an additional 277 accidents within 10 years.



## **FACT:**

The so-called “accident rate” that ALPA has invented encompasses all incidents, including minor ones, regardless of whether or not they were fatigue-related. The fact is that there has not been a single cargo accident in the last 20 years that would have been prevented by applying passenger pilot regulations to cargo pilots.



## MYTH:

Requiring cargo carriers to operate under the same regulations as passenger airlines would enhance safety.



## FACT:

One size does not fit all when it comes to aviation safety. Requiring cargo pilots to operate under regulations developed for passenger pilots would undermine safety, not enhance it.

- Former FAA Administrator and ALPA President Randy Babbitt said at the 2009 ALPA Air Safety Forum, "In rulemaking, not only does one size not fit all, but it's unsafe to think it can."
- Former NTSB Board Member and NHTSA Administrator Dr. Mark Rosekind said at the Alertness 2000 conference sponsored by FAA, "There is no one-size-fits-all...One-size-fits-all creates one box that affects everyone the same way. That is precisely why this type of regulation does not usually work."
- Both Congress and the Administration have thoroughly examined Cargo Flight and Duty Time regulations on multiple occasions and reached the same conclusion: a one-size-fits-all approach does not enhance safety.
- Cargo pilots already fly fewer flight hours than passenger pilots. Under the proposed changes, cargo pilots would conduct even fewer takeoffs and landings, which could negatively impact pilot proficiency.
- The "first night" in a series of night flights is the most challenging in terms of body clock adjustment. Under the proposed changes, cargo pilots would have more "first nights," which could impact pilot alertness and contribute to fatigue.



## MYTH:

Cargo pilots are overworked and fly more hours than passenger airline pilots.



## FACT:

Cargo airlines adhere to all safety regulations and employ extensive fatigue mitigation programs to ensure there is adequate time for pilots to rest. But it is the pilots' responsibility to show up to work rested and ready to fly. Cargo pilots fly considerably fewer hours than passenger pilots. Cargo pilots average approximately 31 hours of "block time" per month compared with 57 hours for passenger pilots.



## MYTH:

Cargo pilots get less rest than airline pilots.



## FACT:

Cargo pilots have longer average layovers between flights and more rest opportunities during working periods than passenger pilots.